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Attorneys for Defendant Amis Integrity S.A.  
by restricted appearance

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

DRY BULK SINGAPORE PTE. LTD,

Plaintiff,

v.

Amis Integrity S.A., *in personam* and M/V  
AMIS INTEGRITY (IMO 9732412) her  
engines, freights, apparel, appurtenances,  
tackle, etc., *in rem*,

Defendants.

Case No. 3:19-cv-1671-BR

IN ADMIRALTY

STIPULATED MOTION AND  
[PROPOSED] ORDER FOR RELEASE OF  
VESSEL

**UNOPPOSED**

**STIPULATED MOTION FOR RELEASE OF VESSEL**

**WHEREAS**, the Plaintiff DRY BULK SINGAPORE PTD. LTD (“Plaintiff”) has caused the Defendant M/V AMIS INTEGRITY (IMO. No. 9732412) (“Vessel”) to be arrested in this jurisdiction pursuant to Rule C of the Supplemental Rules for Certain Admiralty and Maritime Claims; and

STIPULATED MOTION AND [PROPOSED] ORDER FOR RELEASE OF  
VESSEL - Page 1  
[Case No. 3:19-cv-1671-BR]

**WHEREAS**, Defendant AMIS INTEGRITY, S.A., by restricted appearance, filed an Emergency Motion to Vacate Arrest and for Attorneys' Fees, Costs, and Expenses for Wrongful Arrest; and Request for Expedited Hearing Pursuant to Rule E(4)(f) and Local Rules 1017-1 ("Motion to Vacate") (Dkt. #18);

**WHEREAS**, the Court conducted a hearing on October 23, 2019, at which the parties agreed that the Vessel would be released upon posting of a bond in the amount of TWO MILLION FIVE-HUNDRED THOUSAND DOLLARS AND 00/100 CENTS (USD \$2,500,000.00), and AMIS INTEGRITY, S.A.'s Motion to Vacate was withdrawn without prejudice;

**WHEREAS**, AMIS INTEGRITY, S.A., as principal, and ASPEN AMERICAN INSURANCE COMPANY, as surety, have posted a Bond in the amount of TWO MILLION FIVE-HUNDRED THOUSAND DOLLARS AND 00/100 CENTS (USD \$2,500,000.00), conditioned to answer any final judgment (after appeal, if any) that may be rendered against the M/V AMIS INTEGRITY *in rem*, or agreed upon settlement sum, inclusive of any interest and/or costs and/or fees, rendered, or agreed upon by the parties, in this matter;

Plaintiff DRY BULK SINGAPORE PTD. LTD and Defendant AMIS INTEGRITY, S.A., as owner of M/V AMIS INTEGRITY, hereby STIPULATE and AGREE that the Vessel should be released from arrest and allowed to depart this jurisdiction because security in sufficient form and amount has been posted by Defendant AMIS INTEGRITY, S.A. as owner of M/V AMIS INTEGRITY.

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Submitted By:

LE GROS, BUCHANAN & PAUL

DATED October 25, 2019

By: s/ Markus B.G. Oberg  
s/ Daniel J. Park  
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Attorneys for Defendant Amis Integrity, S.A.,  
by restricted appearance

SCHWABE, WILLIAMSON & WYATT, P.C.

DATED October 25, 2019

By: s/ David R. Boyajian  
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Attorneys for Plaintiff Dry Bulk Singapore Ptd.  
Ltd.

**[PROPOSED] ORDER FOR RELEASE OF VESSEL**

Pursuant to the foregoing Stipulated Motion, it is so ORDERED that the vessel M/V AMIS INTEGRITY (IMO. No. 9732412) shall be released from arrest and allowed to depart this jurisdiction because security in sufficient form and amount has been posted by Defendant AMIS INTEGRITY, S.A. as owner of M/V AMIS INTEGRITY, and the United States Marshal and Substitute Custodian Transmarine Navigation Corporation are hereby directed to release the M/V AMIS INTEGRITY from the Court's arrest.

DONE IN OPEN COURT this \_\_\_\_\_ day of October 2019.

\_\_\_\_\_  
HONORABLE ANNA J. BROWN  
UNITED STATES DISTRICT COURT JUDGE

*Presented by:*

LE GROS BUCHANAN & PAUL

s/ Markus B.G. Oberg

s/ Daniel J. Park

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Attorneys for Defendant Amis Integrity, S.A.,

by restricted appearance

**CERTIFICATE OF SERVICE**

I hereby certify that on October 25, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to The Honorable Anna J. Brown and serve it on all associated counsel.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Signed at Seattle, Washington this 25<sup>th</sup> day of October, 2019.

s/ Shelley Courter

Shelley Courter, Legal Assistant

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